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April 2, 2024

BY ECF

The Honorable J. Brendan Day
United States Magistrate Judge
District of New Jersey
Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: **United States v. Township of Jackson et al.,**
Civil Action No. 20-CV-6109 (MAS)(JBD)

Dear Magistrate Judge Day,

Pursuant to Your Honor's November 7, 2023 Order in the above-referenced case (see Docket Entry 57), the United States respectfully submits this status letter on behalf of all parties. Since December 6, 2023, when the parties last submitted a status letter in this case, the parties have continued to work to meet the requirements of the Consent Decree. To date, defendants have fulfilled their respective obligations under the Consent Decree.¹

On February 23, 2024, defendants provided the United States with the third bi-annual report required by the Consent Decree. With respect to the Township's efforts to comply with Paragraph 21, requiring replacement of former Ordinances 03-17 and 04-17, defendants have made additional progress. As noted in the December 6, 2023 status letter submitted by the Parties, the Township drafted separate ordinances to address zoning districts in the Pinelands area and districts outside the Pinelands area. Since the December 6, 2023 status letter, the Township has adopted Ordinance 30-23, addressing non-Pinelands districts. The ordinance addressing Pinelands districts required additional review by the New Jersey Pinelands Commission ("Pinelands Commission"), which was done at a meeting on February 15, 2024. At the conclusion of that meeting, the Pinelands Commission represented to the Township that it would provide Jackson with its requested revisions. Jackson expects to receive those proposed

¹ This letter does not take into account Consent Decree deadline requirements that have not yet been triggered.

revisions to the Pinelands ordinance by April 5, 2024. As noted in the joint status letter filed on December 6, 2023, the United States has reviewed both the Pinelands and non-Pinelands ordinances as they pertain to religious education institutions and religious residential schools only. Based on that limited scope of review, the United States has no objection at this time. Defendants, however, must still apply the ordinances, once passed, in compliance with the Religious Land Use and Institutionalized Persons Act of 2000, 42 U.S.C. and the Fair Housing Act, 42 U.S.C. §§ 3601 et seq.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,

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